

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

DEVAL L. PATRICK Governor RICHARD K. SULLIVAN JR. Secretary

TIMOTHY P. MURRAY Lieutenant Governor KENNETH L. KIMMELL Commissioner

Minor Modification to an AIR QUALITY OPERATING PERMIT

Issued by the Massachusetts Department of Environmental Protection ("Department" or "MassDEP") pursuant to its authority under M.G.L. c. 111, §142B and §142D, 310 CMR 7.00 et seq., and in accordance with the provisions of 310 CMR 7.00: Appendix C.

ISSUED TO ["the Permittee"]:

Fountain Plating Company, Inc.

Application No.: 1-O-07-046

Transmittal No.: W151570

FACILITY LOCATION:

Fountain Plating Company 492 Prospect Avenue West Springfield, MA 01089-4559

NATURE OF BUSINESS:

Metal Finishing, parts cleaning, electroplating and painting

RESPONSIBLE OFFICIAL:

Name: Peter Pulcini Title: Laboratory Manager

FACILITY IDENTIFYING NUMBERS:

AQ ID.: 0420187 FMF FAC NO.: 131227 FMF RO NO.: 50121

Standard Industiral Classification (SIC): 3471

and 3479

North American Industrial Classification System

(NAICS): 332812 and 332813

FACILITY CONTACT PERSON:

Name: Peter Pulcini

Title: Laboratory Manager Phone: (413) 781-4651

Email: peter@fountain-plating.com

This operating permit shall expire on November 20, 2014

For the Department of Environmental Protection

Department of Environmental Protection

Western Regional Office

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.	May 12, 2013	
Michael Gorski	Date	
Regional Director		

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SPECIAL CONDITIONS FOR OPERATING PERMIT

A legend to abbreviated terms found in the following tables is located in Section 30 of this Operating Permit.

1. PERMITTED ACTIVITIES

In accordance with the provisions of 310 CMR 7.00: Appendix C and applicable rules and regulations, the Permittee (Fountain Plating Company hereinafter "FPC") is authorized to operate the air emission units as shown in Table 1 and exempt and insignificant activities as described in 310 CMR 7.00: Appendix C(5)(h) and (i). The units described in Table 1 are subject to the terms and conditions shown in Sections 4, 5, and 6 and to other terms and conditions as specified in this permit. Emissions from the exempt activities shall be included in the total facility emissions for the emission-based portion of the fee calculation described in 310 CMR 4.00 and this permit.

A. DESCRIPTION OF FACILITY AND OPERATIONS

FPC is a job shop type operation primarily engaged in metal finishing including metal parts cleaning, electroplating, anodizing, masking and painting. The facility is located at 492 Prospect Avenue in West Springfield, Massachusetts. The facility air emission sources include a solvent batch vapor degreaser, four roof-mounted fume scrubbers, three manual paint spray booths and paint masking operations, one fuel oil boiler, one fuel oil underground tank, and one curing oven. FPC also has a laboratory, which includes laboratory hoods, wet chemistry, and an exhaust from a pilot bench top plating line. FPC has removed the black chromium plating tank and the decorative chromium plating tank originally designated as emission unit (EU) 5. FPC also conducts activities associated with the manufacture or rework of aerospace vehicles or components. It is subject to the requirements of 40 CFR 63 subpart GG; cleaning operations, hand-wipe and spray gun cleaning and primer/topcoat VOC/HAP usage. FPC uses only coatings identified as specialty coatings and /or low-volume coatings under 40 CFR 63.741(f) and (g). The facility is requesting a facility-wide restriction of less than or equal to 21 tons per year of VOCs, less than 10 tons per year of a single HAP and less than 25 tons per year of multiple HAPs. The primary source of facility HAPs are emitted from the trichloroethylene (TCE) degreaser, which are restricted by permit to less than 1 ton/month and less than 10 tons/year. The facility is exempt from Compliance Assurance Monitoring (CAM).

2. <u>EMISSION UNIT IDENTIFICATION</u>

The following emission units (Table 1) are subject to and regulated by this Operating Permit:

Table 1			
Emission Unit (EU#)	Description of Emission Unit	EU Design Capacity	Pollution Control Device (PCD)
EU 1	Baron Blakeslee DP-8-3648 Vapor Degreaser	N/A	None
EU 2	Two (2) De Villbis #JGA510 Paint Spray Booths	N/A	Fabric Filters
EU 3	One (1) De Villbis #JGA510 Paint Spray Booth	N/A	Fabric Filters
EU 4	Six (6) hard chrome plating tanks (tanks 575 through 580), four (4) chromium anodizing tanks (178, 1673, 1679A and 1679B) and one chromium stripping tank (562)	N/A	Individual composite mesh pad mist eliminator for each unit Composite mesh pad scrubber for all 11 tanks combined (scrubber # 3)
EU 6	Iron Fireman model No. 302-L-250 boiler	8.375 MMBtu/hr	None
EU 7	One Mannix, or equivalent, paint spray booth, and associated paint spray gun(s), including cleanup operations,	N/A	Fabric Filters
EU8	One Mannix, or equivalent, paint spray booth, and associated paint spray gun(s), including cleanup operations,	N/A	Fabric Filters
EU9	One Mannix, or equivalent, paint spray booth, and associated paint spray gun(s), including cleanup operations,	N/A	Fabric Filters
EU10	One Mannix, or equivalent, paint spray booth, and associated paint spray gun(s), including cleanup operations,	N/A	Fabric Filters
EU 11	One Mannix, or equivalent, paint spray booth, and associated paint spray gun(s), including cleanup operations,	N/A	Fabric Filters
EU 12	One Mannix, or equivalent, paint spray booth, and associated paint spray gun(s), including cleanup operations,	N/A	Fabric Filters
EU 13	One Mannix, or equivalent, paint spray booth, and associated paint spray gun(s), including cleanup operations,	N/A	Fabric Filters

IDENTIFICATION OF EXEMPT ACTIVITIES 3.

The following are considered exempt activities in accordance with the criteria contained in 310 CMR 7.00: Appendix C(5)(h):

Table	2
Description of Current Exempt Activities	Reason
The list of current exempt activities is contained in the Operating Permit application and shall be updated by the Permittee to reflect changes at the facility over the Permit term. An up-to-date copy of exempt activities list shall be kept on-site at the facility and a copy shall be submitted to the MassDEP's Regional Office. Emissions from these activities shall be reported on the annual emissions statement pursuant to 310 CMR 7.12.	310 CMR 7.00:Appendix C(5)(h)

4. APPLICABLE REQUIREMENTS

A. OPERATIONAL AND/OR PRODUCTION EMISSION LIMITS AND RESTRICTIONS

The Permittee is subject to the limits/restrictions as contained in Table 3 below:

	Table 3a				
EU#	Fuel or Raw Material	Restrictions	Pollutant	Emission Limit/Standards	Applicable Regulation and/or Approval No.
EU 1	Trichloroethylene (TCE)	See Section 5- Special Terms and Conditions	VOC (TCE)		310 CMR 7.18(8)(b) Approval 1-P-10-032 (dated 10/1/10) 40 CFR Part 63, Subpart T 40 CFR Part 63, Subpart T - Control Option 6 of Table 2
	Paint, including cleanup materials	-	VOC	< 3.0 tons per calendar month and < 9.9 tons during any 12 consecutive month period	Approval 1-P-11-019 (dated 11/21/11) 40 CFR Part 63, Subpart GG
		coatings, as defined in 40 CFR 63.742, are not included in the 50 gallon and 200 gallon annual limits.	НАР	< 1.5 tons per calendar month and < 5.0 tons during any 12 consecutive month	
		See Section 5- Special Terms and Conditions		period	
			Opacity	Visible emissions from the exhaust stack of each paint spray booth shall have 0% opacity.	
EU 4	Chromic acid	See Section 5- Special Terms and Conditions - Pressure drop across composite mesh-pad system compliant with initial test	Chromium	0.019 mg/dscm 568 mg/hr	Approval 1-P-10-032 (dated: 10/1/10) 40 CFR Part 63, Subpart N

			Tab	le 3b	
EU#	Fuel or Raw Material	Restrictions	Pollutant	Emission Limit/Standards	Applicable Regulation and/or Approval No.
EU 6	No. 2 fuel oil, Natural gas	None	Smoke	No. 1 of the Chart no more than 6 minutes during any one hour, at no time to exceed No. 2 of the Chart	Regulation 310 CMR 7.06(1)(a)
			Opacity	\leq 20%, except 20 to \leq 40% for \leq 2 minutes during any one hour	Regulation 310 CMR 7.06(1)(b)
			Sulfur in fuel	≤0.17 lb S/MMBtu (≈0.3% S by weight) prior to July 1, 2014	Regulation 310 CMR 7.05(1)(a)1.
				≤0.05% S by weight from July 1, 2014 through June 30, 2018	
				≤0.015% S on and after July 1, 2018	
Facility- wide	No. 2 fuel oil, Natural gas, Paint, cleanup materials and	tral gas, t, cleanup	VOC	≤21.0 tons / rolling 12 calendar month	Approval 1-O-07-046
	TCE		НАР	TCE < 1.0 tons/month Single HAP < 10 tons / year ⁽¹⁾ Multiple HAP < 25 tons / year ⁽¹⁾	

⁽¹⁾ Based on a 12-month rolling total. Compliance with a 12-month rolling total is determined each month by adding the previous 12 months of HAP emissions and comparing the total to the limit specified above.

B. <u>COMPLIANCE DEMONSTRATION</u>

The Permittee is subject to the monitoring/testing, record keeping, and reporting requirements as contained in Tables 4, 5, and 6 below and 310 CMR 7.00 Appendix C (9) and (10) and applicable requirements contained in Table 3:

	Table 4a
EU#	Monitoring And Testing Requirements
EU 1	1. In accordance with Approval 1-P-10-032 and 40 CFR Part 63.466(a)(1), on a weekly basis, the Permittee shall measure and record the temperature at the center of the chilled air blanket during idling mode using a thermometer or thermocouple.
	2. In accordance with Approval 1-P-10-032 and 40 CFR Part 63.466(b)(1), on a monthly basis, the Permittee shall conduct a visual inspection of the degreaser cover to ensure that it opens and closes properly, completely covers the opening when closed, and is free from cracks, holes, and other defects.
	3. In accordance with Approval 1-P-10-032 and 40 CFR Part 63.466(d)(1), on a weekly basis, the Permittee shall either measure room draft or monitor the room parameters affecting room draft to ensure that they are the same as the conditions observed or established during the last measurement of room draft.
EU 2 EU 3 EU 7 EU 8 EU 9	4. In accordance with Approval 1-P-11-019 and 40 CFR 63.750(b)(1), the Permittee shall determine the composite vapor pressure for single-component hand-wipe cleaning solvents using Material Safety Data Sheets (MSDS) or other manufacturer's data, standard engineering reference texts, or other equivalent methods.
EU 10 EU 11 EU 12 EU 13	5. In accordance with Approval 1-P-11-019 and 40 CFR 63.750(b)(2), the Permittee shall determine the composite vapor pressure for blended hand-wipe solvent by quantifying the amount of each organic compound in the blend using manufacturer's supplied data or a gas chromatographic analysis in accordance with ASTM E 260-91 or 96 (incorporated by reference-see Section 63.14 of subpart A of this part) and by calculating the composite vapor pressure of the solvent by summing the partial pressure of each component. The vapor pressure of each component shall be determined using the manufacturer's data, standard engineering reference texts, or other equivalent methods. The equation stated in 40 CFR 63.750(b)(2) shall be used to determine the composite vapor pressure.
	6. In accordance with Approval 1-P-11-019 and 40 CFR 63.751(a), the Permittee shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system at least once per month. Each inspection shall occur while the system is in operation.
	7. In accordance with Approval 1-P-11-019 and the best available control technology provision of 310 CMR 7.02(8)(a)2., the Mannix paint spray booths (Emission Unit #7 through #13), or equivalent as determined by MassDEP, and Emission Unit #2 and #3 shall be equipped with instrumentation to continuously monitor the pressure drop across the paint spray booth filters.
EU 4	8. In accordance with Approval 1-P-10-032 and 40 CFR Part 63.443(c)(1)(ii), the Permittee shall monitor and record the pressure drop across each mist eliminator and scrubber No. 3 once each day that said equipment is in operation.
EU 6	9. In accordance with 310 CMR 7.04(4)(a), the Permittee shall inspect and maintain each boiler in accordance with the manufacturer's recommendations and test each boiler in accordance with the manufacturer's recommendations for efficient operation once each calendar year.
	10. In accordance with 310 CMR 7.00 Appendix C(9)(b), the Permittee shall monitor sulfur content of each new shipment of No.2 fuel oil received. Compliance with percent sulfur-in-fuel requirements can be demonstrated by maintaining a shipping receipt from the fuel supplier (shipping receipt certification) or through testing (testing certification).

	Table 4b
EU#	Monitoring And Testing Requirements
EU 6	11. The shipping receipt certification or testing certification of percent sulfur-in-fuel shall document that sulfur testing has been done in accordance with the applicable ASTM methods (D129-95, D1266-91,D1552-95, D2622-92, and D4294-90), or any other method approved by MassDEP and EPA.
Facility -wide	12. The Permittee shall monitor operations such that information may be compiled for the preparation of a Source Registration/Emission Statement Form as required by 310 CMR 7.12.
	13.In accordance with 310 CMR 7.13, the Permittee shall conduct stack testing, upon written request of MassDEP, for any air contaminant for which MassDEP has determined testing is necessary, to ascertain compliance with MassDEP's regulations or design approval provisos. All such testing shall be conducted in accordance with 310 CMR 7.13 (1) and (2), and in accordance with the applicable procedures specified in 40 CFR 60 Appendix A or other method(s) if approved by MassDEP and EPA.

	Table 5a
EU#	Record Keeping Requirements
EU 1	1. In accordance with Approval 1-P-10-032 and 40 CFR Part 63.467(a), the Permittee shall maintain the following records for the lifetime of the vapor degreaser: owner's manuals and/or written maintenance and operating procedures; the date of installation of the vapor degreaser and all of its control devices; and documentation of the halogenated HAP solvent content for each solvent used.
	2. In accordance with Approval 1-P-10-032 and 40 CFR Part 63.467(b)(1), the Permittee shall maintain the results of the monitoring required by Table 4a, conditions 1-3 contained herein.
	3. In accordance with Approval 1-P-10-032 and 40 CFR Part 63.467(b)(2), the Permittee shall maintain records of preventative maintenance, inspections, and repairs performed on the vapor degreaser or its control devices.
	4. In accordance with Approval 1-P-10-032 and 40 CFR Part 63.467(b)(3), the Permittee shall maintain an estimate of the amount of solvent consumed by the vapor degreaser each year.
	5. In accordance with 310 CMR 7.18(8)(g), the Permittee shall prepare and maintain daily records sufficient to demonstrate compliance consistent with an instantaneous averaging time as stated in 310 CMR 7.18(2)(a). Records kept to demonstrate compliance shall be kept on site for three years and shall be made available to representatives of MassDEP and EPA in accordance with the requirements of an approved compliance plan or upon request. Such records shall include, but are not limited to:
	 a. identity, quantity, formulation and density of solvent(s) used; b. quantity, formulation and density of all waste solvent(s) generated; c. actual operational and performance characteristics of the degreaser and any appurtenant emissions capture and control equipment, if applicable; and d. any other requirements specified by MassDEP in any approval(s) and/or order(s) issued to the person.

	Table 5b			
EU#	Record Keeping Requirements			
EU 2 EU 3 EU 7 EU 8 EU 9 EU 10 EU 11 EU 12 EU 13	6. In accordance with Approval 1-P-11-019 and 40 CFR 63.752(b)(1), the Permittee shall record the name, vapor pressure and documentation showing the organic HAP constituents of each cleaning solvent used for affected cleaning operations at the facility.			
	 7. In accordance with Approval 1-P-11-019 and 40 CFR 63.752(b)(3), the Permittee shall record, for each cleaning solvent used in hand-wipe cleaning operations that does comply with the vapor pressure requirement in 40 CFR 63.744(b)(2): a. The name of each cleaning solvent used; b. The composite vapor pressure of each cleaning solvent used; c. All vapor pressure test results, if appropriate, data and calculations used to determine the composite vapor pressure of each cleaning solvent; and d. The amount (in gallons) of each cleaning solvent used each month at each operation. 			
	 8. In accordance with Approval 1-P-11-019 and 40 CFR 63.752(b)(5), the Permittee shall keep a record of all leaks from enclosed spray gun cleaners identified pursuant to 40 CFR 63.751(a) that includes for each leak found: a. Source identification; b. Date leak was discovered; and c. Date leak was repaired. 			
	9. In accordance with Approval 1-P-11-019, the Permittee shall maintain a usage log for all coatings that meet the specialty coating definition as specified in 40 CFR 63.742.			
	10. In accordance with Approval 1-P-11-019, the Permittee shall maintain a usage log for all low-volume coatings and shall record the quantity (gallons) of each separate coating formulation used each month and each year as well as the combined monthly and annual total for all low-volume coatings used at the facility.			
	 In accordance with Approval 1-P-11-019, the Permittee shall prepare and maintain sufficient daily records for each paint spray booth. Such records shall include, but are not limited to: For each coating, as applied: Gallons of coating used; Coating density (pounds per gallon); Pounds of VOC per gallon of coating; Pounds of solids per gallon of coating; Pounds of water per gallon of coating; Pounds of other non-VOC liquid per gallon coating; Pounds of VOC per gallon of solids as applied; and Pounds of HAP per gallon of coating. Gallons of exempt/non-compliance coatings used; Gallons of cleanup solution used, pounds of VOC per gallon and pounds of HAP per gallon; and Maintenance records of filter pad replacement and disposal Records shall be kept on site for five years and must be made available to representatives of the MassDEP upon request 			
	12. In accordance with Approval 1-P-11-019, the Permittee shall record the pressure drop across each of the paint spray booth filters once each shift during which coating operations occur and record the acceptable limit of pressure drop as specified by the filter or booth manufacturer.			

	Table 5c
EU#	Record Keeping Requirements
EU 2 EU 3 EU 7 EU 8 EU 9	13. In accordance with Approval 1-P-11-019, by the 30 th day of each month, the Permittee shall calculate and record the volatile organic compound emissions from the surface coating of miscellaneous metal parts and products (Emission Unit #2, #3 and #7 through #13), including cleanup operations, for the previous calendar month and for the previous 12-month period.
EU 10 EU 11 EU 12 EU 13	14. In accordance with Approval 1-P-11-019, by the 30 th day of each month, the Permittee shall calculate and record the individual and total HAP emissions from the surface coating of miscellaneous metal parts and products (Emission Unit #2, #3 and #7 through #13), including cleanup operations, for the previous calendar month and for the previous 12-month period.
EU 4	15. In accordance with Approval 1-P-10-032 and 40 CFR Part 63.346(b)(8), the Permittee shall maintain results of daily measurements of pressure drop across each mist eliminator and scrubber No. 3 for each day that the equipment is in operation.
	16. In accordance with Approval 1-P-10-032 and 40 CFR Part 63.346(b)(1), the Permittee shall maintain records of inspections of the mist eliminators, scrubber No. 3, and monitoring equipment to document that the Permittee complied with the work practice standards listed in Section 5 Special Terms and Conditions, condition 20 contained herein. Such records shall include an identification of the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies.
	17. In accordance with Approval 1-P-10-032 and 40 CFR Part 63.346(b)(2), the Permittee shall maintain records of all maintenance performed on the chromium electroplating and anodizing tanks, mist eliminators, scrubber No. 3, and monitoring equipment.
	18. In accordance with Approval 1-P-10-032 and 40 CFR Part 63.346(b)(3), the Permittee shall maintain records of malfunctions of process equipment, air pollution control devices, and monitoring equipment. Such records shall include the identity of the malfunctioning equipment, the date and time of occurrence, the duration, and the cause (if known).
	19. In accordance with Approval 1-P-10-032, dated 09/24/02 and 40 CFR Part 63.346(b)(4), the Permittee shall maintain records of actions taken during periods of malfunction. Such records shall indicate whether or not the actions were consistent with the O&M plan.
	20. In accordance with Approval 1-P-10-032, 40 CFR Part 63.346(b)(6) and (7), the Permittee shall maintain test reports or other written records documenting the results of all performance tests, including descriptions of facility operating conditions during testing.
	21. In accordance with Approval 1-P-10-032, 40 CFR Part 63.346(b)(9) and (10), the Permittee shall maintain records of periods of excess emissions, including the date and time of commencement and completion and the reasons for excess emissions (if known).
	22. In accordance with Approval 1-P-10-032 and 40 CFR Part 63.346(b)(12), the Permittee shall maintain records of the actual cumulative rectifier capacity of hard chromium plating tanks expended during each month and the total capacity expended to date during a reporting period.

Table 5d		
EU#	Record Keeping Requirements	
EU 6	23. In accordance with 310 CMR 7.04(4)(a), the Permittee shall maintain records of the results of the inspection, maintenance, and annual testing required by this Regulation and shall post these results conspicuously on or near the emission unit.	
	24. In accordance with 310 CMR 7.00 Appendix C(9)(b)2., the Permittee shall demonstrate compliance for each new shipment of No. 2 fuel oil received with the % sulfur-in-fuel requirement specified in 310 CMR 7.05(1)(a)2 by maintaining records of testing certifications or shipping receipt certifications, either of which must certify that the shipment complies with the ASTM specifications for #2 oil and the specified % sulfur-in-fuel requirement.	
Facility -wide	25. In accordance with 310 CMR 7.00 Appendix C(10)(b), the Permittee shall maintain records of all monitoring data and supporting information on-site for a period of at least five years from the date of the monitoring sample, measurement, report or initial operating permit application. Supporting information includes, at a minimum, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the operating permit, and any other information required to interpret the monitoring data.	
	26. In accordance with 310 CMR 7.00 Appendix C(10)(b), the Permittee shall maintain records of all monitoring data and supporting information on-site for a period of at least five years from the date of the monitoring sample, measurement, report or initial operating permit application.	
	27. In accordance with 310 CMR 7.12(3)(b), the Permittee shall maintain copies of Source Registration and other information supplied to the Department to comply with 310 CMR 7.12, which shall be retained by the facility owner or operator for five years from the date of submittal.	
	28. In accordance with Approval 1-P-10-032, the Permittee shall calculate and record by the 30 th day of each month, the facility-wide emissions of VOCs for the previous calendar month and for the previous 12-month period.	
	29. In accordance with 1-O-07-046, the Permittee shall calculate and record by the 30 th day of each month, the facility-wide emissions of individual and total HAP emissions for the previous calendar month and for the previous 12-month period.	

Table 6a				
EU#	Reporting Requirements			
EU 1	In accordance with Approval 1-P-10-032 and 40 CFR Part 63.468(f), the Permittee shall submit an annual report to MassDEP and EPA by January 30 of each year covering the preceding calendar year. Each annual report shall contain: A signed statement from the facility owner or his or her designee stating that "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their			
	control devices sufficient to pass the test required in 40 CFR §63.463(d)(10)." and, b. An estimate of the annual solvent consumption for the vapor degreaser.			
	2. In accordance with 40 CFR Part 63.468(h), the Permittee shall submit an exceedance report to the Administrator semiannually except when, the Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph (i) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30 th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information in 40 CFR Part 63.468(h) (1) – (3)			
	3. In accordance with Approval 1-P-10-032, the Permittee shall submit semiannual reports to MassDEP (one by January 30 for the time period July - December of the previous calendar year, and the other by July 30 for the time period January - June of the current calendar year). Each report shall summarize the VOC emissions during each month from parts cleaning (degreasing operation, using TCE).			
EU 2 EU 3 EU 7 EU 8 EU 9 EU 10 EU 11 EU 12 EU 13	 4. In accordance with Approval 1-P-11-019 and 40 CFR 63.753(b)(1), the Permittee shall submit semiannual reports to MassDEP and EPA (one by January 30 for the time period July - December of the previous calendar year, and the other by July 30 for the time period January - June of the current calendar year). The reports shall include: a. Any instance where a noncompliant cleaning solvent is used for a non-exempt hand-wipe cleaning operation; b. A list of any new cleaning solvents used for hand-wipe cleaning in the previous 6 months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements specified in 40 CFR 63.744(b)(1); c. Any instance where a noncompliant spray gun cleaning method is used; d. Any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days; and e. If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the applicable standards. Source shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements. 			

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- 5. In accordance with 40 CFR 63.753(c)(1), the Permittee shall submit semiannual reports to MassDEP and EPA (one by January 30 for the time period July December of the previous calendar year, and the other by July 30 for the time period January June of the current calendar year). The reports shall identify:
 - a. All times when the topcoat or primer operation was not immediately shutdown when the pressure drop across the filter system was recorded outside specific limits specified by the filer or booth manufacturer or in locally prepared operating procedures.
 - b. If the operations have been in compliance for the semiannual period, a statement that the operations have been in compliance with the applicable standards.

Table 6b			
EU#	Reporting Requirements		
EU 2 EU 3 EU 7 EU 8 EU 9 EU 10 EU 11 EU 12 EU 13	6. In accordance with 40 CFR 63.753(c)(2), the Permittee shall submit an annual report to MassDEP and EPA by January 30 of each year the number of times the pressure drop was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures.		
	 7. In accordance with Approval 1-P-11-019, the Permittee shall submit semiannual reports to MassDEP (one by January 30 for the time period July - December of the previous calendar year, and the other by July 30 for the time period January - June of the current calendar year) for the VOC emissions from the miscellaneous metals parts coating. Each report shall include: a. The VOC emissions from the surface coating of miscellaneous metal parts and products (Emission Unit #2, #3 and #7 through #13), including cleanup operations, during each month and during each 12 consecutive month period that ended during the reporting period; and b. The total HAP emissions from the surface coating of miscellaneous metal parts and products (Emission Unit #2, #3 and #7 through #13), including cleanup operations, during each month and during each 12 consecutive month period that ended during the reporting period. 		

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EU 4	8. In accordance with Approval 1-P-10-032 and 40 CFR Part 63.347, the Permittee shall submit semiannual compliance status reports to MassDEP and EPA regarding compliance of the chromium electroplating and anodizing equipment. However, if an exceedance of an emission limit occurs, the reporting frequency shall increase to quarterly. Exceedance reports shall be submitted by the 30 th day following the end of each calendar quarter or half, as appropriate. The compliance status reports shall contain:
	a. The total operating time of each chromium electroplating or anodizing tank during the reporting period.
	b. The actual cumulative rectifier capacity expended during each month of the reporting period and the total for the entire reporting period.
	c. A summary of the pressure drop data for scrubber No. 3 and each mist eliminator during the reporting period, the total duration of excess emissions for each emission unit (as indicated by the pressure drop data), and the total duration of excess emissions for each emission unit expressed as a percent of the total unit operating time.
	d. A breakdown of the total duration of excess emissions into the time fractions that were due to process upsets, control equipment malfunctions, other known causes, and unknown causes.
	e. A certification by a responsible official that the work practice standards listed in Special Term and Condition (8) of this permit were followed in accordance with the O&M plan. If THE PERMITTEE did not follow the O&M plan, the report shall explain why not.
	f. A description of any changes in monitoring, processes, or controls since the last reporting period.
EU 6	9. In accordance with 310 CMR 7.00 Appendix C(10)(c), the Permittee shall submit to MassDEP two summaries (one by January 30 for the time period July - December of the previous calendar year, and the other by July 30 for the time period January - June of the current calendar year) of all monitoring data and related supporting information. The summaries shall contain the following (corresponding to items in Table 4 of this Operating Permit):
	a. A statement specifying whether the boiler has been tested for efficient operation and,b. A statement specifying whether compliance has been maintained with the oil sulfur monitoring requirement.

Table 6c				
EU#	Reporting Requirements			
Facility -wide	10. In accordance with Approval 1-P-10-032, the Permittee shall submit facility-wide VOC emissions semiannual reports to MassDEP (one by January 30 for the time period July - December of the previous calendar year, and the other by July 30 for the time period January - June of the current calendar year). Each report shall summarize the total facility-wide VOC emissions during each month and during each 12 consecutive month period that ended during the reporting period.			
	11. In accordance with 1-O-07-046, the Permittee shall submit facility-wide individual and total HAP emission semiannual reports to MassDEP (one by January 30 for the time period July - December of the previous calendar year, and the other by July 30 for the time period January - June of the current calendar year). Each report shall summarize the total facility-wide HAP emissions and the highest facility-wide individual HAP emission during each month and during each 12 consecutive month period that ended during the reporting period.			
	12. In accordance with 310 CMR 7.12, the Permittee shall submit a Source Registration/Emission Statement form to the MassDEP on an annual basis.			

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- 13. In accordance with 310 CMR 7.00 Appendix C(5)(b)9., the Permittee shall submit annually a certification that the facility is maintaining the required records to assure the facility is in compliance with the applicable requirements designated in this permit. (See Provision 10 in "GENERAL CONDITIONS FOR OPERATING PERMIT")
- 14. In accordance with 310 CMR 7.00 Appendix C(10)(a), the Permittee shall submit to the MassDEP any record relevant to this operating permit or to the emissions of any air contaminant from the facility within 30 days of the request by the MassDEP or EPA.
- 15. In accordance with 310 CMR 7.00 Appendix C(10)(c), the Permittee shall submit to the MassDEP two compliance summaries, one by January 30 for the time period July December of the previous calendar year, and the other by July 30 for the time period January June of the current calendar year. (See Provision 10 in "GENERAL CONDITIONS FOR OPERATING PERMIT")
- 16. In accordance with 310 CMR 7.13(1)(d), the Permittee shall submit to the MassDEP any stack test results for any air contaminant obtained from stack testing required by the MassDEP within such time as agreed to in the approved test protocol.
- 17. In accordance with 310 CMR 7.00 Appendix C(10)(f), the Permittee shall report to the MassDEP's Regional Bureau of Waste Prevention all instances of deviations from permit requirements. (See Provision 25 in "GENERAL CONDITIONS FOR OPERATING PERMIT")

C. GENERAL APPLICABLE REQUIREMENTS

The Permittee shall comply with all generally applicable requirements contained in 310 CMR 7.00 et seq. and 310 CMR 8.00 et. seq., when subject.

D. REQUIREMENTS NOT CURRENTLY APPLICABLE

The Permittee is currently not subject to the following requirements:

Table 7		
Regulation	Reason	
310 CMR 7.16: Reduction of Single Occupant Commuter Vehicle Use	Facility employs fewer than 250 people	
310 CMR 7.25: Consumer and Commercial Products	Not Applicable	
42 U.S.C. 7401 §112 (r): Prevention of Accidental Release	Facility does not store, use or process any of the listed compounds in quantities greater than thresholds.	
42 U.S.C. 7401 § 601: Stratospheric Ozone	Not Applicable	
40 CFR Part 64: Compliance Assurance Monitoring	Not Applicable	

5. SPECIAL TERMS AND CONDITIONS

The Permittee is subject to and shall comply with the following special terms and conditions that are not contained in Table 3, 4, 5, and 6:

Table 8a **Special Terms and Conditions** 1. The batch vapor degreaser shall meet the following design and equipment specifications: EU 1 a. The degreaser shall have an idling and downtime mode cover that may be readily opened or closed, that completely covers the degreaser opening when in place, does not disturb the vapor zone, and is free of cracks, holes, and other defects. The cover shall close below the level of any lip exhaust intake; b. The freeboard ratio, defined as the ratio of the freeboard height to the smaller interior dimension (length or width) of the degreaser, shall be greater than or equal to 1.0; c. The degreaser shall have an automated parts handling system capable of moving parts into or out of the degreaser at a speed no greater than 11.0 feet per minute; d. The degreaser shall have a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils or if the condenser coolant is not circulating properly; e. The degreaser shall have a vapor level control device to shut off the sump heat if the vapor level rises above the height of the freeboard refrigeration device; and f. The degreaser shall have a freeboard refrigeration device capable of generating a chilled air blanket having a temperature less than or equal to 30% of the solvent boiling point. For trichloroethylene, the maximum temperature of the chilled air blanket shall be 56.7° F as measure in the center of the air blanket.

Table 8b

Special Terms and Conditions

EU 1

- The permittee shall comply with the following work and operational practices with respect to the vapor degreaser:
 - a. The cover shall be closed during the idling mode and the downtime mode, unless the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover to be open;
 - b. The parts baskets or parts being cleaned shall not occupy more than 50% of the solvent/air interface area;
 - c. Any spraying operations shall be performed within the vapor zone;
 - d. Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from the degreaser to allow solvent to drain;
 - e. Parts baskets or parts shall not be removed from the degreaser until dripping has stopped;
 - f. During startup of the degreaser, the freeboard refrigeration device shall be turned on before the sump heater.
 - g. During shutdown, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the freeboard refrigeration device is turned off;
 - h. When solvent is added to or drained from the degreaser, it shall be transferred using threaded or other leak proof couplings. The end of the pipe in the solvent sump shall be located beneath the liquid solvent surface;
 - i. The degreaser shall be maintained in accordance with the manufacturer's recommendations;
 - j. Each operator of the degreaser shall take and pass the applicable sections of the operating procedures test contained in 40 CFR Part 63 Subpart T Appendix A if requested by MassDEP or the United States Environmental Protection Agency ("EPA") during an inspection of the facility;
 - k. Waste solvent, still bottoms, and sump bottoms shall be stored in closed containers. The containers may contain pressure relief devices if said devices will not allow liquid solvent to drain from the containers;
 - l. The permittee shall not clean sponges, fabric, wood, paper products, and other absorbent materials in the vapor degreaser; and
 - m The permittee shall repair any liquid leaks or shut down the degreaser immediately upon discovery of said leaks; and
 - n. The permittee shall determine whether an exceedance has occurred in accordance with 40 CFR Part 63.463(e)(3).
- 3. The permittee shall ensure that the flow of air across the top of the freeboard area of the degreaser does not exceed 50 feet per minute at any time as measured using the procedures contained in 40 CFR Part 63 §63.466(d). The permittee shall establish, document, and maintain the conditions under which the room draft was determined to be less than or equal to 50 feet per minute.
- 4. EU 1 is subject to the requirements of 40 CFR 63.1-15, Subpart A, "General Provisions" as indicated in Appendix B to Subpart T of 40 CFR 63. Compliance with all applicable provisions therein is required.

Table 8c **Special Terms and Conditions** EU2 In accordance with Approval 1-P-11-019, EU2, EU3, EU7, EU8, EU9, EU10, EU11, EU12, EU13, and EU3 associated paint spray gun(s), including cleanup operations, for the surface coating of miscellaneous EU7 metal parts and products are to be constructed and operated in accordance with the plans submitted with EU8 Plan Approval application 1-P-11-019. EU9 In accordance with Approval 1-P-11-019 and the best available control technology provision of 310 EU 10 CMR 7.02(8)(a)2., spray guns shall utilize one of the following methods of spray application and be EU 11 maintained and operated in accordance with the recommendations of the manufacturer: EU 12 EU 13 a. Electrostatic spray application; or b. High Volume Low Pressure (HVLP) spray application; or c. Any other coating application method that achieves a transfer efficiency equivalent to electrostatic or HVLP spray application and is approved by the MassDEP in writing. 7. In accordance with Approval 1-P-11-019 and the best available control technology provision of 310 CMR 7.02(8)(a)2, the Mannix paint spray booths (Emission #7 through #13), or equivalent as determined by MassDEP, and Emission Unit #2 and #3 shall utilize two or more layers of dry fiber mat filter with a total thickness of at least two inches or an equivalent system as determined in writing by the MassDEP and that achieves particulate control efficiency of at least 97% by weight. Filter material shall be disposed in accordance with all applicable MassDEP regulations. 8. In accordance with Approval 1-P-11-019 and the best available control technology provision of 310 CMR 7.02(8)(a)2, the face velocity of air at each paint spray booth filter shall not exceed 200 feet per minute. 9. In accordance with Approval 1-P-11-019, the Mannix paint spray booths (Emission Unit #7 through #13), or equivalent as determined by MassDEP, and Emission Unit #2 and #3 shall have a stack or stack(s) which are conforming to the following criteria: a. The stack shall discharge vertically upwards; b. The stack shall not have rain protection of a type that restricts the vertical exhaust flow; c. The stack gas exit velocity shall be greater than 40 feet per second; and d. The minimum stack exit height shall be 35 feet above the ground or ten feet above roof level. 10. In accordance with Approval 1-P-11-019 and the best available control technology provision of 310 CMR 7.02(8)(a)2, spray painting operations shall not be conducted outside of the paint spray booth. 11. In accordance with Approval 1-P-11-019, the best available control technology provision of 310 CMR 7.02(8)(a)2. and 40 CFR 63.744(b)(2), the Permittee shall only use cleaning solvents for hand-wipe cleaning which have a composite vapor pressure of 45 mm Hg (24.1 in. H₂O) or less at 20°C (68°F).

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12. In accordance with Approval 1-P-11-019, the best available control technology provision of 310 CMR 7.02(8)(a)2 and 40 CFR 63.744(a)(1), the Permittee shall place used solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning operations are exempt from this requirement.

Table 8d **Special Terms and Conditions** 13. In accordance with Approval 1-P-11-019, the best available control technology provision of 310 CMR EU2 7.02(8)(a)2 and 40 CFR 63.744(a)(2), the Permittee shall store fresh and spent cleaning solvents in EU3 closed containers. EU7 EU8 In accordance with Approval 1-P-11-019, the best available control technology provision of 310 CMR EU9 7.02(8)(a)2 and 40 CFR 63.744(a)(3), the Permittee shall conduct the handling and transfer of EU 10 cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation EU 11 equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills. EU 12 EU 13 15. In accordance with Approval 1-P-11-019, the best available control technology provision of 310 CMR 7.02(8)(a)2 and 40 CFR 63.744(c)(1)(i) and (ii), the Permittee shall clean the spray gun(s) in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing solvent through the gun. If leaks are found during the monthly inspection required in 40 CFR 63.751(a), repairs shall be made as soon as practicable, but no later than 15 days after the leak was found. If the leak is not repaired by the 15th day after detection, the cleaning solvent shall be removed, and the enclosed cleaner shall be shut down until the leak is repaired or its use is permanently discontinued. 16. In accordance with Approval 1-P-11-019 and the best available control technology provision of 310 CMR 7.02(8)(a)2, spray guns shall be cleaned in a device that: a. minimizes solvent evaporation during the cleaning, rinsing, and draining operations; b. recirculates solvent during the cleaning operation so that the solvent is reused; and, c. collects spent solvent in a container with a tight-fitting cover so that it is available for proper disposal or recycling. 17. In accordance with Approval 1-P-11-019 and the best available control technology provision of 310 CMR 7.02(8)(a)2, the Permittee shall employ all reasonable good housekeeping practices to minimize fugitive VOC and HAP emissions from the use of surface preparation products, cleanup solutions and the handling of coatings and any other VOC-containing and/or HAP-containing materials. The Permittee shall keep rags used during surface preparation or other solvent cleaning operations, fresh and spent solvent, and any other VOC-containing and/or HAP-containing materials in tightly closed containers as much as practical during use and at all times when not being used. 18. In accordance with Approval 1-P-11-019, the hand-wipe cleaning, each spray gun cleaning operation, organic VOC or HAP emissions from primer or topcoat applications and inorganic HAP emissions from primer or topcoat applications performed at the facility are subject to Subpart GG of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.741 through 63.759. The Permittee

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shall comply with all applicable requirements of the Subpart as well as any other applicable Subpart of the Standards of Hazardous Air Pollutants.

19. In accordance with Approval 1-P-11-019, all air pollution control system monitoring devices including, but not limited to, differential pressure gauges, pressure tap lines, thermocouples, flow rate meters, and chart recorders shall be maintained in good working order and calibrated in accordance with the manufacturers' recommendations.

Table 8e						
Special Terms and Conditions						
EU 2 EU 3 EU 7 EU 8 EU 9 EU 10 EU 11 EU 12 EU 13	20.	EU 2, EU 3, EU 7, EU 8, EU 9, EU 10, EU 11, EU 12. EU 13 are subject to the requirements of 40 CFR 63.1-15, Subpart A. "General Provisions" as indicated in Table 1 to Subpart GG of 40 CFR 63. Compliance with all applicable provisions therein is required.				
EU 4	21.	At all times, including periods of startup, shutdown and malfunction, the Permittee shall operate and maintain its chromium electroplating equipment, including air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices.				
	22.	The Permittee shall comply with the following work practice standards at all times, including periods of normal operation, startup, shutdown, and malfunction:				
		a. Once per calendar quarter, visually inspect scrubber No. 3 and each mist eliminator to ensure there is proper drainage and no chromic acid buildup on the mesh pads.				
		b. Once per calendar quarter, visually inspect scrubber No. 3 and each mist eliminator to ensure there is no evidence of chemical attack on the structural integrity of the devices.				
		c. Once per calendar quarter, visually inspect the composite mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.				
		d. Once per calendar quarter, visually inspect the exhaust system ductwork to ensure there are no leaks.				
		e. Wash down the mist eliminators and scrubber No. 3 regularly in accordance with the O&M plan.				
		f. Clean and inspect the magnehelic gauges and related connections once per calendar quarter. The magnehelic connections shall be cleaned by backflushing them with water or removing them from the duct and rinsing them with fresh water. The magnehelic gauges and related connections shall be checked for damage and replaced if cracked or fatigued.				
	23.	The Permittee shall prepare, implement and maintain up to date an Operation and Maintenance Plan ("O& M plan") meeting the requirements of 40 CFR Part 63.342(f)(3).				
	24.	EU4 is subject to the requirements of 40 CFR 63.1-15, Subpart A, "General Provisions" as indicated in Table 1 to Subpart N of 40 CFR 63. Compliance with all applicable provisions therein is required.				

6. ALTERNATIVE OPERATING SCENARIOS

The Permittee did not request alternative operating scenarios in its Operating Permit application.

7. EMISSIONS TRADING

A. INTRA-FACILITY EMISSION TRADING

The Permittee did not request intra-facility emissions trading in its Operating Permit application.

B. INTER-FACILITY EMISSION TRADING

The Permittee did not request inter-facility emissions trading in its Operating Permit application.

8. COMPLIANCE SCHEDULE

The Permittee has indicated that the facility is in compliance and shall remain in compliance with the applicable requirements contained in Sections 4 and 5.

In addition, the Permittee shall comply with any applicable requirements that become effective during the Permit term.

GENERAL CONDITIONS FOR OPERATING PERMIT

9. FEES

The Permittee has paid the permit application processing fee and shall pay the annual compliance fee in accordance with the fee schedule pursuant to 310 CMR 4.00.

10. COMPLIANCE CERTIFICATION

All documents submitted to the MassDEP shall contain certification by the responsible official of truth, accuracy, and completeness. Such certification shall be in compliance with 310 CMR 7.01(2) and contain the following language:

"I certify that I have personally examined the foregoing and am familiar with the information contained in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment."

The "Operating Permit Reporting Kit" contains instructions and the Annual Compliance Report and Certification and the Semi-Annual Monitoring Summary Report and Certification. The "Operating Permit Reporting Kit" is available to the Permittee via the MassDEP's web site, http://www.mass.gov/dep/air/approvals/aqforms.htm#op.

A. Annual Compliance Report and Certification

The Responsible Official shall certify, annually for the calendar year, that the facility is in compliance with the requirements of this Operating Permit. The report shall be postmarked or delivered by January 30 to the MassDEP and to the Regional Administrator, U.S. Environmental Protection Agency - New England Region. The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

- 1) the terms and conditions of the Permit that are the basis of the certification;
- 2) the current compliance status and whether compliance was continuous or intermittent during the reporting period;
- 3) the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and
- 4) any additional information required by the MassDEP to determine the compliance status of the source.

B. Semi-Annual Monitoring Summary Report and Certification

The Responsible Official shall certify, semi-annually on the calendar year, that the facility is in compliance with the requirements of this Permit. The report shall be postmarked or delivered by

January 30 and July 30 to the MassDEP. The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

- 1) the terms and conditions of the Permit that are the basis of the certification;
- 2) the current compliance status during the reporting period;
- 3) the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods;
- 4) whether there were any deviations during the reporting period;
- 5) if there are any outstanding deviations at the time of reporting, and the Corrective Action Plan to remedy said deviation;
- 6) whether deviations in the reporting period were previously reported;
- 7) if there are any outstanding deviations at the time of reporting, the proposed date of return to compliance;
- 8) if the deviations in the reporting period have returned to compliance and date of such return to compliance; and
- 9) any additional information required by the MassDEP to determine the compliance status of the source.

11. NONCOMPLIANCE

Any noncompliance with a permit condition constitutes a violation of 310 CMR 7.00: Appendix C and the Clean Air Act, and is grounds for enforcement action, for Permit termination or revocation, or for denial of an Operating Permit renewal application by the MassDEP and/or EPA. Noncompliance may also be grounds for assessment of administrative or civil penalties under M.G.L. c.21A, §16 and 310 CMR 5.00; and civil penalties under M.G.L. c.111, §142A and 142B. This Permit does not relieve the Permittee from the obligation to comply with any other provisions of 310 CMR 7.00 or the Act, or to obtain any other necessary authorizations from other governmental agencies, or to comply with all other applicable Federal, State, or Local rules and regulations, not addressed in this Permit.

12. PERMIT SHIELD

- A. This facility has a permit shield provided that it operates in compliance with the terms and conditions of this Permit. Compliance with the terms and conditions of this Permit shall be deemed compliance with all applicable requirements specifically identified in Sections 4, 5, 6, and 7, for the emission units as described in the Permittee's application and as identified in this Permit.
 - Where there is a conflict between the terms and conditions of this Permit and any earlier approval or Permit, the terms and conditions of this Permit control.
- B. The MassDEP has determined that the Permittee is not currently subject to the requirements listed in Section 4, Table 7.
- C. Nothing in this Permit shall alter or affect the following:

- 1) the liability of the source for any violation of applicable requirements prior to or at the time of Permit issuance.
- 2) the applicable requirements of the Acid Rain Program, consistent with 42 U.S.C. §7401, §408(a); or
- 3) the ability of EPA to obtain information under 42 U.S.C. §7401, §114 or §303 of the Act.

13. ENFORCEMENT

The following regulations found at 310 CMR 7.02(8)(h) Table 6 for wood fuel, 7.04(9), 7.05(8), 7.09 (odor), 7.10 (noise), 7.18(1)(b), 7.21, 7.22, 7.70 and any condition(s) designated as "state only" are not federally enforceable because they are not required under the Act or under any of its applicable requirements. These regulations and conditions are not enforceable by the EPA. Citizens may seek equitable or declaratory relief to enforce these regulations and conditions pursuant to Massachusetts General Law Chapter 214, Section 7A

All other terms and conditions contained in this Permit, including any provisions designed to limit a facility's potential to emit, are enforceable by the MassDEP, EPA and citizens as defined under the Act.

A Permittee shall not claim as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.

14. PERMIT TERM

This Permit shall expire on the date specified on the cover page of this Permit, which shall not be later than the date 5 years after issuance of this Permit.

Permit expiration terminates the Permittee's right to operate the facility's emission units, control equipment or associated equipment covered by this Permit, unless a timely and complete renewal application is submitted at least 6 months before the expiration date.

15. PERMIT RENEWAL

Upon the MassDEP's receipt of a complete and timely application for renewal, this facility may continue to operate subject to final action by the MassDEP on the renewal application.

In the event the MassDEP has not taken final action on the Operating Permit renewal application prior to this Permit's expiration date, this Permit shall remain in effect until the MassDEP takes final action on the renewal application, provided that a timely and complete renewal application has been submitted in accordance with 310 CMR 7.00: Appendix C(13).

16. REOPENING FOR CAUSE

This Permit may be modified, revoked, reopened, and reissued, or terminated for cause by the MassDEP and/or EPA. The responsible official of the facility may request that the MassDEP terminate the facility's Operating Permit for cause. The MassDEP will reopen and amend this Permit in accordance with the conditions and procedures under 310 CMR 7.00: Appendix C(14).

The filing of a request by the Permittee for an Operating Permit revision, revocation and reissuance, or termination, or a notification of a planned change or anticipated noncompliance does not stay any Operating Permit condition.

17. DUTY TO PROVIDE INFORMATION

Upon the MassDEP's written request, the Permittee shall furnish, within a reasonable time, any information necessary for determining whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall furnish to the MassDEP copies of records that the Permittee is required to retain by this Permit.

18. DUTY TO SUPPLEMENT

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a complete renewal application was submitted but prior to release of a draft permit.

The Permittee shall promptly, on discovery, report to the MassDEP a material error or omission in any records, reports, plans, or other documents previously provided to the MassDEP.

19. TRANSFER OF OWNERSHIP OR OPERATION

This Permit is not transferable by the Permittee unless done in accordance with 310 CMR 7.00: Appendix C(8)(a). A change in ownership or operation control is considered an administrative permit amendment if no other change in the Permit is necessary and provided that a written agreement containing a specific date for transfer of Permit responsibility, coverage and liability between current and new Permittee, has been submitted to the MassDEP.

20. PROPERTY RIGHTS

This Permit does not convey any property rights of any sort, or any exclusive privilege.

21. INSPECTION AND ENTRY

Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of the MassDEP, and EPA to perform the following:

- A. enter upon the Permittee's premises where an operating permit source activity is located or emissions-related activity is conducted, or where records must be kept under the conditions of this Permit:
- B. have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;

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- C. inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and
- D. Sample or monitor at reasonable times any substances or parameters for the purpose of assuring compliance with the Operating Permit or applicable requirements as per 310 CMR 7.00 Appendix C(3)(g)(12).

22. PERMIT AVAILABILITY

The Permittee shall have available at the facility, at all times, a copy of the materials listed under 310 CMR 7.00: Appendix C(10)(e) and shall provide a copy of the Operating Permit, including any amendments or attachments thereto, upon request by the MassDEP or EPA.

23. SEVERABILITY CLAUSE

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstances, is held invalid, the application of such provision to other circumstances, and the remainder of this Permit, shall not be affected thereby.

24. EMERGENCY CONDITIONS

The Permittee shall be shielded from enforcement action brought for noncompliance with technology based¹ emission limitations specified in this Permit as a result of an emergency². In order to use emergency as an affirmative defense to an action brought for noncompliance, the Permittee shall demonstrate the affirmative defense through properly signed, contemporaneous operating logs, or other relevant evidence that:

- A. an emergency occurred and that the Permittee can identify the cause(s) of the emergency;
- B. the permitted facility was at the time being properly operated;
- C. during the period of the emergency, the Permittee took all reasonable steps as expeditiously as possible, to minimize levels of emissions that exceeded the emissions standards, or other requirements in this Permit; and
- D. the Permittee submitted notice of the emergency to the MassDEP within two (2) business days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

¹ Technology based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain health based air quality standards.

² An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology based limitation under the Permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of any of these things.

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If an emergency episode requires immediate notification to the Bureau of Waste Site Cleanup/Emergency Response, immediate notification to the appropriate parties should be made as required by law.

25. PERMIT DEVIATION

Deviations are instances where any permit condition is violated and not reported as an emergency pursuant to section 24 of this Permit. Reporting a permit deviation is not an affirmative defense for action brought for noncompliance. Any reporting requirements listed in Table 6. of this Operating Permit shall supersede the following deviation reporting requirements, if applicable.

The Permittee shall report to the MassDEP's Regional Bureau of Waste Prevention the following deviations from permit requirements, by telephone, fax or electronic mail (e-mail), within three (3) days of discovery of such deviation:

- A. Unpermitted pollutant releases, excess emissions or opacity exceedances measured directly by CEMS/COMS, by EPA reference methods or by other credible evidence, which are ten percent (10%) or more above the emission limit.
- B. Exceedances of parameter limits established by your Operating Permit or other approvals, where the parameter limit is identified by the Permit or approval as surrogate for an emission limit.
- C. Exceedances of Permit operational limitations directly correlated to excess emissions.
- D. Failure to capture valid emissions or opacity monitoring data or to maintain monitoring equipment as required by statutes, regulations, your Operating Permit, or other approvals.
- E. Failure to perform QA/QC measures as required by your Operating Permit or other approvals for instruments that directly monitor compliance.

For all other deviations, three (3) day notification is waived and is satisfied by the documentation required in the subsequent Semi-Annual Monitoring Summary and Certification. Instructions and forms for reporting deviations are found in the MassDEP Bureau of Waste Prevention Air Operating Permit Reporting Kit, which is available to the Permittee via the MassDEP's web site, http://www.mass.gov/dep/air/approvals/aqforms.htm#op.

This report shall include the deviation, including those attributable to upset conditions as defined in the Permit, the probable cause of such deviations, and the corrective actions or preventative measures taken.

Deviations that were reported by telephone, fax or electronic mail (e-mail) within 3 days of discovery, said deviations shall also be submitted in writing via the Operating Permit Deviation Report to the regional Bureau of Waste Prevention within ten (10) days of discovery. For deviations, which do not require 3-day verbal notification, follow-up reporting requirements are satisfied by the documentation required in the aforementioned Semi-Annual Monitoring Summary and Certification.

26. OPERATIONAL FLEXIBILITY

The Permittee is allowed to make changes at the facility consistent with 42 U.S.C. §7401, §502(b)(10) not specifically prohibited by the Permit and in compliance with all applicable requirements provided the Permittee gives the EPA and the MassDEP written notice fifteen days prior to said change; notification is not required for exempt activities listed at 310 CMR 7.00: Appendix C(5)(h) and (i). The notice shall

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comply with the requirements stated at 310 CMR 7.00: Appendix C(7)(a) and will be appended to the facility's Permit. The permit shield allowed for at 310 CMR 7.00: Appendix C(12) shall not apply to these changes.

27. MODIFICATIONS

- A. Administrative Amendments The Permittee may make changes at the facility which are considered administrative amendments pursuant to 310 CMR 7.00: Appendix C(8)(a)1., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(b).
- B. Minor Modifications The Permittee may make changes at the facility which are considered minor modifications pursuant to 310 CMR 7.00: Appendix C(8)(a)2.,provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(d).
- C. Significant Modifications The Permittee may make changes at the facility which are considered significant modifications pursuant to 310 CMR 7.00: Appendix C(8)(a)3., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(c).
- D. No permit revision shall be required, under any approved economic incentives program, marketable permits program, emission trading program and other similar programs or processes, for changes that are provided in this Operating Permit. A revision to the Permit is not required for increases in emissions that are authorized by allowances acquired pursuant to the Acid Rain Program under Title IV of the Act, provided that such increases do not require an Operating Permit revision under any other applicable requirement.

28. OZONE DEPLETING SUBSTANCES

This section contains air pollution control requirements that are applicable to this facility, and the United States Environmental Protection Agency enforces these requirements.

- A. The Permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - All containers containing a class I or class II substance that is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR 82.106.
 - 2) The placement of the required warning statement must comply with the requirements of 40 CFR 82.108.
 - 3) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR 82.110.
 - 4) No person may modify, remove or interfere with the required warning statement except as described in 40 CFR 82.112.
- B. The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVAC) in Subpart B:

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- 1) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices of 40 CFR 82.156.
- 2) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment of 40 CFR 82.158.
- 3) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- 4) Persons disposing of small appliances, MVACs and MVAC-like appliances (as defined in 40 CFR 82.152) must comply with recordkeeping requirements of 40 CFR 82.166.
- 5) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair equipment requirements of 40 CFR 82.156.
- 6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
- C. If the Permittee manufactures, transforms, imports or exports a class I or class II substance, the Permittee is subject to all the requirements as specified in 40 CFR Part82, Subpart A, "Production and Consumption Controls".
- D. If the Permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners". The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo or system used on passenger buses using HCFC-22 refrigerant.
- E. The Permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

29. PREVENTION OF ACCIDENTAL RELEASES

This section contains air pollution control requirements that are applicable to this facility, and the United States Environmental Protection Agency enforces these requirements.

Your facility is subject to the requirements of the General Duty Clause, under 112(r)(1) of the CAA Amendments of 1990. This clause specifies that owners or operators of stationary sources producing, processing, handling or storing a chemical in any quantity listed in 40 CFR Part 68 or any other extremely hazardous substance have a general duty to identify hazards associated with these substances and to design, operate and maintain a safe facility, in order to prevent releases and to minimize the consequences of accidental releases which may occur.

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30. LEGEND OF ABBREVIATED TERMS IN OPERATING PERMIT

Not all abbreviations are present in every Operating Permit

10⁶ Btu/hr–1,000,000 Btu per hour

CEM-Continuous emission monitor

CGA-Cylinder gas audit

The Chart-the Ringelmann Scale for grading the density of smoke

CO-Carbon monoxide

CO₂-Carbon dioxide

COM-Continuous opacity monitor

DAS-Data acquisition system

EPA or USEPA - Environmental Protection Agency

EU – Emission Unit

FMF FAC. NO.-Facility Master File Number

FMF RO NO.-Facility Master File Regulated Object Number

ft³–Cubic feet

HAP- Hazardous air pollutants

HHV-Higher heating value

hr-Hour

ISO-Represents 59° F, 60% Relative Humidity, 29.92 Inches Mercury At Sea Level lb-Pound

lb/hr - Pounds per hour

lb/MMBtu-Pounds per million British thermal units

mg/dscf - milligram per dry standard cubic foot

MassDEP – Massachusetts Department of Environmental Protection

MMBtu/hr-Million British thermal units per hour

MW-Megawatt (1,000,000 watts)

N/A – Not applicable

ng-Natural gas

NH₃-Ammonia

NO_x-Nitrogen oxides

O₂ - Oxygen

Pb- Lead

PCD - Pollution control device

PLT ID-Plant Identification

PM-Particulate matter

ppm-Parts per million

ppmvd-Parts per million (by volume, dry)

PTE-Potential to emit

RATA-Relative accuracy test audit

SO₂-Sulfur dioxide

SSEIS-Stationary Source Emission Inventory System

tpy-Tons per year

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VOC-Volatile organic compound

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APPEAL CONDITIONS FOR OPERATING PERMIT

This Permit is an action of the MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing within 21 days of issuance of this Permit. In addition, any person who participates in any public participation process required by the Federal Clean Air Act, 42 U.S.C. §7401, §502(b)(6) or under 310 CMR 7.00: Appendix C(6), with respect to the MassDEP's final action on operating permits governing air emissions, and who has standing to sue with respect to the matter pursuant to federal constitutional law, may initiate an adjudicatory hearing pursuant to Chapter 30A, and may obtain judicial review, pursuant to Chapter 30A, of a final decision therein.

If an adjudicatory hearing is requested, the facility must continue to comply with all existing federal and state applicable requirements to which the facility is currently subject, until a final decision is issued in the case or the appeal is withdrawn. During this period, the application shield shall remain in effect, and the facility shall not be in violation of the Act for operating without a Permit.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts which are the grounds for the request, and the relief sought. Additionally, the request must state why the Permit is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to The Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

The Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

The request will be dismissed if the filing fee is not paid unless the appellant is exempt or granted a waiver as described below.

The filing fee is not required if the appellant is a city or town (or municipal agency) county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

The MassDEP may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.